



. OSHA Injury Log Requirements

Revisions proposed to mandated injury log.

By Paul J. Tibbs

The U.S. Occupational Safety and Health Administration (OSHA) is reforming itself by introducing OSHA 300, a successor to the agency's existing injury and illness log program. It replaces OSHA 200, which critics have long targeted as being cumbersome and confusing.

OSHA also is proposing a new 301 program to replace the existing 101 log used for recording and reporting injuries. It is similar to the Workers' Compensation report filed with employees' resident states.

I was very impressed upon first encountering this "revision." Numerous changes were made and, theoretically, the proposed log is easier to understand and fill out. The log is on standard size paper and requires fewer entries. OSHA provides some new definitions pertaining to log specifics such as what information must be recorded and who must sign the certification.

History Lesson

In 1971 OSHA published 29 CFR 1904, the occupational injury and illness recording and reporting regulation. The federal labor secretary delegated responsibility for the regulation's statistical program to the Bureau of Labor Statistics (BLS).

While BLS conducted the survey and maintained the information, OSHA administered the program. In 1991 all responsibility was transferred to OSHA's Office of Statistics.

This regulation was designed to:

- * Require employers to record and report work-related injuries, illnesses and fatalities.
- * Provide information for employers and employees, raising their awareness of the kinds of injuries and illnesses occurring in the workplace and their related hazards.
- * Provide OSHA compliance staff with information that can facilitate safety and health inspections.
- * Produce statistical data on the incidence of workplace injuries and illness.

All employers covered by the act, regardless of size of Standard Industrial Classification (SIC), must report any occupational fatality or work-related event resulting in the hospitalization of three or more employees within eight hours after the employee death or in-patient hospitalization. This requirement applies to each fatality or hospitalization of three or more employees that occurs within 30 days of an incident.

If notified in writing by an authorized government agency, employers must maintain an OSHA Injury and Illness Log and Summary for any year in which they are required to participate in a data collection program for occupational injuries and illnesses. Employers must file reports with OSHA within 21 days of an agency request.

Official Response

OSHA allows employees to keep an electronic or a consolidated log for multiple businesses, provided there are no more than 20 employees. Required log entries must be made within seven days.

OSHA defines recordable data as any new, work-related injury or illness which also meets one or more of the following conditions:

- * Death or loss of consciousness
- * Results in one or more days away from work
- * Restricted work activity or job transfer
- * Requires medical treatment beyond first aid, or
- * Is a recordable condition listed in a regulatory supplement.

OSHA 301 is similar to Worker's Compensation reports. Under the current OSHA 200, filers can use their state Worker's Compensation form instead of filling out the OSHA 101. Under OSHA 300, the same can be done, though the state form must follow the same format and order as the OSHA 301 and must use the same language.

At the end of the year, the OSHA 300 and the OSHA 301s will be completed by employers. Then, it's time to certify the entries and post the log. If no injuries or illnesses occurred during the year, zeroes must be entered on the total line.

The certification section must be signed by a "responsible company official" and the log posted no later than February 1 of the following year. (A responsible company official is a company owner, corporate officer, the highest ranking company official working at the business or that person's immediate supervisor.) The log must remain posted until January 31 of the next year. Records must be maintained on a calendar year basis and must be retained for three years.

The OSHA 300 and 301 forms are now easier to complete. The frustrating part is that while this

program is designed primarily for gathering statistics, OSHA still has the authority to cite and penalize a company for failing to maintain the log or recording faulty information on it.

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